

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF TEXAS
Fort Worth Division**

UNITED STATES OF AMERICA

Plaintiff,

V.

THE BOEING COMPANY,

Defendant.

customers that purchased the 737 MAX (“airline customers”) and that asked to be included in the discussions. In addition to submitting briefs, the families are seeking a hearing on the motions they expect to file with the Court, and for the Court to later set a date for the plea hearing if after the motions hearing the Court decides to accept the plea agreement. The Government and Boeing agree to their request.

Accordingly, the attached proposed Scheduling Order—agreed to by the families (except for those represented by Collins Bargione & Vuckovich¹), the airline customers, and Boeing—respectfully presents the Court with a briefing schedule, as well as seeks from the Court a date certain for a hearing on the motions the families expect to file so that the families who can attend can plan their travel. The representatives of the families are mindful of the many other cases on the Court’s docket. They have committed, as the hearing date approaches, to advising the Court of how many family members intend to appear in person and the ways in which the family members are working to avoid duplicative statements and to present their concerns efficiently.

¹ Counsel from Collins Bargione & Vuckovich objects to the Government and Boeing having two weeks to file their respective briefs in response, whereas the families and anyone else who files an opening brief have one week to do so from the date the Government files the plea agreement. It was the families who proposed one week for their opening brief. The reason the Government and Boeing requested the courtesy of an additional week, to which everyone else agreed, is that the families and airline customers have had the benefit of the June 30th conferral session with the Government, and the Government’s July 7th notice to them and status report to the Court, explaining the material terms of the plea agreement. They are therefore able to begin (and may have already begun) preparing their briefs before the plea agreement is filed. Further, the Government and Boeing will likely have to respond to multiple opening briefs.

Respectfully submitted,

GLENN S. LEON
Chief, Fraud Section, Criminal Division
United States Department of Justice

LEIGHA SIMONTON
United States Attorney
Northern District of Texas

By: s/ Lorinda I. Laryea

Lorinda I. Laryea
Principal Deputy Chief
D.C. Bar No. 997696
lorinda.laryea@usdoj.gov

By: s/ Chad E. Meacham

Chad E. Meacham
Assistant United States Attorney
Texas Bar No. 00784584
chad.meacham@usdoj.gov

Sean P. Tonolli
Senior Deputy Chief
D.C. Bar No. 503346
sean.tonolli@usdoj.gov

United States Attorney's Office
Northern District of Texas
801 Cherry Street, 17th Floor
Fort Worth, TX 76102
817-252-5200

United States Department of Justice
Criminal Division, Fraud Section
1400 New York Avenue, N.W.
Washington, D.C. 20005
202-514-2000

cc: Counsel of Record (via ECF)